

5.	Email from Megan Simpson to Megan Simpson, dated September 2, 2019 and attached email from Chip Keating, dated August 17, 2019	
6.	Email from Stephanie Dodd to Megan Simpson, dated August 30, 2019 re: "time with Joe Claro."	
7.	Emails between Stephanie Dodd and Megan Simpson, dated August 30, 2019 "Re: Joe Claro"	
8.	Letter from Governor Kevin Stitt re: "Chief of the Highway Patrol Michael Harrell is unable to effectively lead the Department of Public Safety, dated 9/2/2019.	
9.	Memo to Commissioner Rusty Rhoades from Megan L. Simpson, dated October 29, 2018 (4 pages)	
10.	Text Messages between Chip Keating and Rusty Rhoades, dated May 23, 2019 through September 2, 2019 (4 pages)	
11.	Notes of Jason Nelson "Taken during call Aug. 20, 2019" (Nelson 0294 - 0296)	
12.	Memorandum re: "The top three employees in the Oklahoma Department of Public Safety were terminated today by Gov. J. Kevin Stitt," undated (Nelson 0297 – 0302)	
13.	August and September 2019 calendars	
14.	"DPS Mtg" notes of Jason Nelson (Nelson 0303 – 0339)	
15.	Jason Nelson Notes (Nelson 0340 – 0366)	
16.	Letter from Rob Mikell to Megan Simpson, dated May 10, 2019 (Nelson 0403)	
17.	Letter from Robert Mikell to Megan Simpson, undated (Nelson 0404)	
18.	Notes dated 5/21/2019 (Nelson 0406)	
19.	Email from Jason Nelson to Rusty Rhoades, dated August 22, 2019 and attached emails (Nelson 0418-0419)	
20.	Notes identified as "Rusty's Notes", undated (Nelson 0426)	
21.	Notes dated 07-29-19 (Nelson 0427)	
22.	Email from Chip Keating to Kathy Mires, dated October 8, 2019 and associated email chain (Nelson 0463-0466)	
23.	Email from Chip Keating to Kathy Mires, dated October 8, 2019 and associated email chain (Nelson 0474-0476)	

24.	Email from Chip Keating to Kathy Mires, dated October 8, 2019 and associated email chain (Nelson 0480-0481)	
25.	Email from Chip Keating to Kathy Mires, dated October 8, 2019 and associated email chain (Nelson 0482)	
26.	Email from Chip Keating to Kathy Mires, dated October 8, 2019 and associated email chain (Nelson 0517-0518)	
27.	Email from Chip Keating to Kathy Mires, dated October 8, 2019 and associated email chain (Nelson 0600-0601)	
28.	Text messages between Jason Nelson and Megan Simpson (Nelson 0640-0641)	
29.	Text messages between Jason Nelson and Mike Harrell (Nelson 0643)	
30.	Notes dated 8/17/19 (Nelson 0678)	
31.	Draft Statement from John Scully, undated (Nelson 0679)	
32.	List of questions proposed for John Scully (Nelson 0680)	
33.	List of "My Goals," undated (Nelson 0686)	
34.	Notes from Jason Nelson (Nelson 0687-0691)	
35.	Emails between Rusty Rhoades and Jason Nelson (Nelson 0692)	
36.	Oklahoma State Trooper Article titled "Two New Faces in OHP Leadership (Nelson 0729)	
37.	Statement of J. Kevin Stitt re: Megan Simpson, dated 9/2/19 (Nelson 0761)	
38.	Statement of J. Kevin Stitt re: Rusty Rhoades, dated 9/2/19 (Nelson 0762)	
39.	Statement of J. Kevin Stitt re: Michael Harrell, dated 9/12/19 (Nelson 0763)	
40.	Memorandum of J. Kevin Stitt re: delegation of authority to Jason Nelson, dated September 2, 2019 (Nelson 0764)	
41.	DPS Call Script of Jason Nelson (Nelson 0765)	
42.	Checklist for Monday, Sept. 2 (Nelson 0767)	
43.	Checklist of Jason Nelson (Nelson 0768)	
44.	Checklist of Jason Nelson (Nelson 0771)	
45.	Text messages from "Chip," various dates (Nelson 0785 – 0791)	

46.	Text message group conversation between Nelson, Keating, Harder, Budd and Junk, dated September 2, 2019 (Nelson 0792 – 0801)	
47.	Text messages between Jason Nelson and “Matt,” dated Sep. 2 (Nelson 0802-0803)	
48.	Text messages between Rusty Rhoades and Jason Nelson, dated Jul 11 (Nelson 0218)	
49.	Email from Chip Keating to Kathy Mires re: Keep it Up, and associated emails dated October 8, 2019 (Nelson 0534-535)	
50.	Email from Chip Keating to Kathy Mires, dated October 8, 2019 and associated email chain (Nelson 0593-0596)	
51.	Email from Chip Keating to unknown, dated August 17, 2019 (DFTS_002298)	
52.	Email from Kevin Stitt to various, dated Aug 21, 2019 (DFTS_000036)	
53.	Email from Rusty Rhoads to Chip Keating and Jason Nelson, dated August 22, 2019 (Nelson 0699-0701)	
54.	Email to Rusty Rhoads from unknown, dated August 27, 2019 (DFTS_000042)	
55.	Email from Jason Nelson to Zachary Parker re: REAL ID Meeting, dated August 28, 2019 (DFTS_002244-002245)	
56.	Email from Chip Keating to Kathy Mires, and associated email chain, dated October 8, 2019 (Nelson 0602-0603)	
57.	Email from Chip Keating to kathy@keatinginv.com and associated email chain (DFTS_000005)	
58.	Email from Chip Keating to Donelle Harder, Michael Junk, John Budd, and Jason Nelson, dated October 5, 2019, and associated email chain (DFTS_000099)	
59.	Email from Chip Keating to kathy@keatinginv.com, dated October 8, 2019, and associated email chain (DFTS_000006)	
60.	Text Messages “To: Chip Keating” (Nelson 0804)	
61.	Text Messages between Chip Keating and Donelle Harder, dated Aug 30, and all associated text messages (Nelson 0209-0214)	
62.	Group Text Messages dated Sep 2 (Nelson 0220-0229)	
63.	“Wed Sept. 4, 2019 Notes” (DFTS_002301)	

64.	Email from Chip Keating to Kim Carter and others, dated Oct 3, 2019 (DFTS_001741-001742)	
65.	"JOINT TSA PRESS CONFERENCE, WED. NOV. 6" brief. (DFTS_001516)	
66.	OK REAL ID Program Dashboard, dated 10-18-2019 (DFTS_001486)	
67.	Email from Michael Junk to Donelle Harder and others, dated Oct 9, 2019 and associated emails (DFTS_002079-002081)	
68.	Email from Chip Keating to John Budd, and associated emails, dated Oct 17, 2019 (DFTS_001767)	
69.	Email from Chip Keating to John Scully and Patrick Mays, and associated emails, dated Oct 17, 2019 (DFTS_001766)	
70.	Email from Chip Keating to Michael Lee and others, dated Oct 17, 2019 (DFTS_001762-1765)	
71.	Email from Kyra Oles to Jason Nelson and others, dated Oct 18, 2019 (DFTS_002085)	
72.	Email from John Scully to Chip Keating, dated Oct 21, 2019 and associated emails (DFTS_001484-1485)	
73.	Letter from John Scully to Chip Keating, dated December 18, 2019 (DFTS_001143)	
74.	Email from John Scully to Chip Keating, dated Dec 19, 2019 (DFTS_001142)	
75.	Email from Chip Keating to John Scully, dated Jan 30, 2020, and associated emails (DFTS_000407-00409)	
76.	Text messages between "Tim" and "Chip," dated Jan 19, 2019 (Keating 0001)	
77.	Text messages between "Rusty" and Chip Keating (Keating 0002-0018)	
78.	Email from Chip Keating to Rhoades, Harrell, and Simpson, dated Aug 17, 2019 (DFTA_000034)	
79.	Resume of John Scully (Nelson 0681)	
80.	Statement re: John Scully (Nelson 0685)	
81.	Text message to Mike Harrell (Nelson 0693)	
82.	Text messages to Megan Simpson (Nelson 0694-0695)	
83.	Bar Disciplinary Proceedings involving Shad Withers, dated June 18, 2019 (Nelson 0709)	
84.	DPS Call Script with Notes of Jason Nelson (Nelson 0769)	

85.	Termination strategy memorandum (Nelson 0770)	
86.	Text messages from “Matt,” dated Sep 2 (Nelson 0230-231)	
87.	Text messages to Megan Simpson (Nelson 0232-233)	
88.	Text messages to Michael Harrell (Nelson 0234)	
89.	Email from Chip Keating to Megan Simpson, dated April 11, 2019	
90.	Email from Rusty Rhoades to Gerald Davidson, dated April 12, 2019, and associated emails (3 pages)	
91.	Email from David Ostrowe to Megan Simpson and Rusty Rhoades, dated June 4, 2019, and associated email chain and attachments (4 pages)	
92.	Meeting reminder for “Meet with Rusty Rhoades – Real ID” dated August 21, 2019	
93.	Email from Rusty Rhoades to Chip Keating re: Real ID, dated August 30, 2019, and associated email chain	
94.	Email from Rusty Rhoades to Michael Junk and Chip Keating, dated July 23, 2019 and attached REAL ID Extension Request draft and REAL ID Checklists (14 pages)	
95.	Email from Rusty Rhoades to Donelle Harder re: REAL ID Extension Letter and attached letter from Kevin Stitt and REAL ID Checklists (11 pages)	
96.	Email from Megan Simpson to Michael Harrell, dated March 3, 2019 re: Stan Walker and Troy German (2 pages)	
97.	Email from Michael Harrell to Billie Watkins re: Retirement Letter, dated June 28, 2019 and associated email chain (2 pages)	
98.	Oklahoma DPS/Oklahoma Highway Patrol Major Case Record Investigative Report, Case Number 18-0631CI for investigative period 11/20/2018 – 2/04/2019	
99.	<i>Troy German v. Rhoades, et al.</i> , USWDC of Oklahoma Case No.: CIV-19-751-F Deposition Transcript of Testimony of David Prater	
100.	<i>Troy German v. Rhoades, et al.</i> , USWDC of Oklahoma Case No.: CIV-19-751-F Deposition Transcript of Testimony of Chip Keating	
101.	Job Search Summary of Billy D. “Rusty” Rhoades with supporting documentation	
102.	2018 W2 of Billy D. “Rusty” Rhoades	

103.	2019 Tax Return and supporting documents of Billy D. "Rusty" Rhoades	
104.	2020 Tax Return of Billy D. "Rusty" Rhoades	
105.	2021 Tax Return and supporting documents of Billy D. "Rusty" Rhoades	
106.	Documents relating to pre- and post-employment insurance costs for Billy D. "Rusty" Rhoades	
107.	List of increased expenses for Billy D. "Rusty" Rhoades	
108.	Resume of Billy D. "Rusty" Rhoades	
109.	OLERS calculations for Billy D. "Rusty Rhoades"	
110.	Demonstrative aid of actual damages for Bill D. "Rusty" Rhoades	
111.	Job Search Summary of Mike Harrell with supporting documentation	
112.	2018 Tax Return of Mike Harrell	
113.	2019 Tax Return of Mike Harrell	
114.	2020 Tax Return of Mike Harrell	
115.	2021 Tax Return of Mike Harrell	
116.	Resume of Mike Harrell	
117.	OLERS calculations for Mike Harrell	
118.	Job Search Summary of Megan L. Simpson with supporting documentation	
119.	Demonstrative aid of actual damages for Mike Harrell	
120.	2018 Tax Return of Megan L. Simpson	
121.	2019 Tax Return of Megan L. Simpson	
122.	2020 Tax Return of Megan L. Simpson	
123.	2021 Tax Return of Megan L. Simpson	
124.	OPERS Information for Megan L. Simpson	
125.	Resume of Megan L. Simpson	
126.	Demonstrative aid of actual damages for Megan L. Simpson	
127.	OMES Reports	
128.	Email from Melinda Brown to Mike Harrell, dated May 23, 2022	
129.	Email from Mary Krehbiel to Mike Harrell, dated May 3, 2022	
130.	Email from usastaffingoffice@opm.gov to Mike Harrel, dated April 13, 2022	
131.	Email from Choctaw Nation Human Resources, dated December 14, 2021	

132.	Email from PROPAK Corporation to Michael Harrel, dated March 14, 2022	
133.	Email from Kim Roach to Michael Harrell, dated December 13, 2022	
134.	Email from Choctaw Nation Human Resources to Michael Harrell, dated November 18, 2021	
135.	Email from Cherokee Nation Businesses Recruiting Team to Michael Harrell, dated November 17, 2021	
136.	Email from Jenks Public Schools to Michael Harrell, dated October 18, 2021	
137.	Email from usastaffingoffice@opm.gov, dated September 13, 2021	
138.	ABF Freight Job Application Report for Michael Harrell, undated	
139.	Email from Cherokee Nation Businesses Recruiting Team, dated August 24, 2021	
140.	Email from Lynelle Klein to Megan Simpson, dated April 25, 2020	
141.	Email from Megan Simpson to Stephanie Dodd, dated November 26, 2019	
142.	Email from Megan Simpson dated February 15, 2019	
143.	Email from Stephanie Dodd to Megan Simpson, dated September 13, 2019	
144.	Email from Stephanie Dodd to Megan Simpson, dated September 23, 2019 and associated email from Megan Simpson to Stephanie Dodd, dated September 23, 2019.	
145.	Email from Patrick Mays to Megan Simpson, dated November 18, 2020	
146.	Memorandum from Commissioner Rusty Rhoades to Megan Simpson, dated October 29, 2018	
147.	Text messages from Chip Keating to Rusty Rhoades, dated May 23, 2019 and May 31, 2019	
148.	Group text message from Chip Keating to Mike Harrell and Rusty Rhoades, undated	
149.	Text message from Jason Nelson to Rusty Rhoades, undated, "confirming choice to retire."	
150.	OLERS statement to Billy D. Rhoades III, dated 4/30/2021	
151.	OLERS "Decision to Elect a Service Pension When Eligible for Back DROP" letter to Rusty Rhoades, dated October 23, 2019	

152.	Email and job description from Stephanie Pafume to Rusty Rhoades, dated April 27, 2021	
153.	Resume of Rusty Rhoades	
154.	Email from Rusty Rhoades requesting State benefits calculation for Mike Harrell	
155.	Emails between Rusty Rhoades, Michael Harrell, and Duane Michael, dated July 26-30, 2021	
156.	Email from Duane Michael to Mike Harrell, dated August 3, 2021	
157.	Email to Jason Bivens, dated September 26, 2019 re: OK Datamark Position	
158.	Email from Rusty Rhoades to Jason Bivens, dated September 25, 2019	
159.	Email from Jason Bivens to Rusty Rhoades, dated September 25, 2019	
160.	Email from Billy Rhoades III to Duane Michael, dated July 26, 2021	
161.	Email from Braums to Rusty Rhoades, dated March 18, 2021	
162.	Monthly Benefit Allowances for Plan Year Jan 1-Dec 31, 2021	
163.	OLERS Calculation Worksheet/Estimate for Michael Harrell, dated 7/30/2021	
164.	Email from Duane Michael to Rusty Rhoades, dated August 3, 2021	
165.	Emails between Rusty Rhoades and Duane Michael, dated July 26 - 30, 2021	
166.	OLERS Calculation Worksheet/Estimate for Billy D. Rhoades III, dated 7/30/21	
167.	OMES Information Services Quarterly Report, FY 2019, Quarter 3	
168.	OMES Information Services Quarterly Report excerpts re: Real ID, FY 2019, Quarter 3	
169.	Email from Megan Simpson to Stephanie Dodd, dated November 26, 2019	
170.	Monthly Cumulative Plan Premiums for Current Employees for Plan Year Jan 1 – Dec 31, 2021	
171.	OLERS Calculation Worksheet/Estimate for Michael S. Harrell, dated 7/30/2021	
172.	Email from Cherokee Nation Businesses Recruiting Team to Mike Harrell, dated August 24, 2021	

173.	ArcBest Logo Job Application Descriptions for Michael Harrell, undated	
174.	Email from USA Staffing Office/Bureau of Indian Affairs to Michael Harrell, dated September 13, 2021	
175.	Letter from U.S. Department of Justice to Michael Harrell, dated November 1, 2019	
176.	Email from Navistar to Michael Harrell, dated May 6, 2021	
177.	Contract Investigator Application for Michael Steven Harrell, undated	
178.	Independent Contractor Agreement for Michael Steven Harrell, dated March 12, 2020	
179.	Email from Cristine Lovato to Michael Harrell, dated 11/17/20	
180.	Email from Cristine Lovato to Michael Harrell, dated 6/8/2021	
181.	Email from Michael Harrell to Cristine Lovato, dated 6/7/2021	
182.	Email from Michael Harrell to Cristine Lovato 11/17/2020 and associated email chain	
183.	Email from Michael Harrell re: Clearance, dated 10/8/2020	
184.	Email from Michael Harrell re: Security Clearance, dated 11/13/2020	
185.	Email from Lynelle Klein to Megan Simpson, dated April 25, 2020	
186.	Email from Stephanie Dodd to Megan Simpson, dated November 26, 2019	
187.	Email from Stephanie Dodd to Megan Simpson re: Continuation of Health Coverage, dated September 13, 2019	
188.	Emails to/from Stephanie Dodd to Megan Simpson re: Annual leave payment, dated September 23, 2019 (2 pages)	
189.	Email from Patrick Mays to Megan Simpson, dated November 18, 2020 re: inquiry from ADC on November 16	
190.	Letter to Pat Mays, from Megan Simpson, dated November 18, 2020	
191.	OLERS statement to Billy D. Rhoades, undated	

192.	State of Oklahoma Memo to Billy “Rusty” Rhoades III, dated October 23, 2019 re: “Decision to Elect a Service Pension When Eligible for Back DROP”	
193.	Billy D. Rhoades Retirement/Termination OLERS estimate statement reflecting “Date? 11-30-19”	
194.	Braum’s Ice Cream Job Description for Security Director at Braum’s Corporate Office and attached email from Stephanie Pafume to Rusty Rhoades, dated April 27, 2021 (3 pages)	
195.	Resume of Rusty Rhoades, undated (4 pages)	
196.	Emails between Duane Michael, Rusty Rhoades, and Mike Harrell, dated July 26-27, 2021 (5 pages)	
197.	Email between Rusty Rhoades and Jason Bivens re: Accepted interview for OK Datamark position, dated September 25-26, 2019 (6 pages)	
198.	Email from Billy Rhoades III to Duane Michael, dated July 26, 2021	
199.	Email from “Braums@icims” to Rusty Rhoades, dated March 18, 2021	
200.	Monthly Cumulative Plan Premiums for Current Employees Plan Year Jan 1-Dec. 31, 2021, identifying monthly benefit allowances	
201.	OLERS calculation worksheet for Michael Harrell, dated 7/30/21 (6 pages)	
202.	Email from Duane Michael to Billy Rhoades III, dated August 3, 2021 attaching Monthly Cumulative Plan Premiums, dated August 3, 2021	
203.	Emails to/from Billy Rhoades III, Duane Michael, and Mike Harrell, dated July 26-30, 2021 (3 pages)	
204.	OLERS Calculation Worksheet for Billy D. Rhoades III, dated 7/30/21 (12 pages)	
205.	OMES Information Services Quarterly Report, FY 2019, Quarter 3 (7 pages)	
206.	Email from Megan Simpson to Stephanie Dodd, dated November 26, 2019 re: Moving Arrangements	
207.	Email to/from Stephanie Dodd to Megan Simpson, dated August 30, 2019 (2 pages)	
208.	Statement from Governor Kevin Stitt, dated 9/2/19 re: Michael Harrell	
209.	Monthly Cumulative Plan Premiums for Current Employees, plan year Jan 1 – Dec. 31, 2021 for Michael Harrell	

210.	OLERS Calculation Worksheet for Michael S. Harrell, dated 7/30/2021 (6 pages)	
211.	Email to Mike Harrell re: "Supervisor Park Management Cherokee Nation Businesses," dated August 24, 2021	
212.	ArcBest Logo Job Search for Michael Harrell (2 pages)	
213.	Email from usastaffingoffice@opm.gov to Michael Harrell, dated September 13, 2021 (2 pages)	
214.	Email from U.S. DOJ to Michael Harrell, dated November 1, 2019 re: Special Investigator position	
215.	Email dated May 6, 2021 re: Application of Mike Harrell for Security Consultant position with Navistar, Inc. (2 pages)	
216.	Job Application of Michael Steven Harrell – Contract Investigator/Oklahoma-Arkansas Area of Coverage, undated (3 pages)	
217.	Independent Contractor Agreement for Michael Steven Harrell, dated 3-22-2020 (4 pages)	
218.	Email from Christine Lovato to Michael Harrell, dated 11/17/2020 (2 pages)	
219.	Email from Christine Lovato to Michael Harrell, dated 6/8/2021 (2 pages)	
220.	Email from Michael Harrell to Christine Lovato, dated 6/7/2021	
221.	Email from Michael Harrell to Christine Lovato, dated 11/17/2020 (3 pages)	
222.	Email from Michael Harrell to clearance@adcltdnm.com re: "Clearance," dated 10/8/2020	
223.	Email from Michael Harrell to clearance@adcltdnm.com re: "Clearance," dated 11/13/2020	
224.	Oklahoma DPS/Oklahoma Highway Patrol Major Case Record Investigative Report, Case Number 18-0631CI for investigative period 11/20/2018 – 2/04/2019	
225.	<i>Troy German v. Rhoades, et al.</i> , USWDC of Oklahoma Case No.: CIV-19-751-F Deposition Transcript of Testimony of David Prater	
226.	<i>Troy German v. Rhoades, et al.</i> , USWDC of Oklahoma Case No.: CIV-19-751-F Deposition Transcript of Testimony of Chip Keating	

227.	All documents produced and identified during discovery by Jason Nelson (Nelson 0001 - 0846)	
228.	All documents produced and identified during discovery by Chip Keating (Keating 0001 - 0018)	
229.	All documents produced and identified during discovery by Joe Claro (Claro 0001-0116)	
230.	All documents produced and identified during discovery by Kevin Stitt	
231.	All documents produced and identified during discovery by any Defendant, including but not limited to (DFTS_00001 through 002684, German 0001-2172) unless otherwise objected to by Plaintiffs.	
232.	All documents identified and/or produced by IDEMIA and/or the State of Oklahoma related to REAL ID, including but not limited to all dashboard status reports/summaries and/or progress reports on REAL ID.	
233.	All newspaper articles referring or relating to the subject events, particularly quotes from parties.	
234.	All documents obtained through Subpoens duces tecum.	
235.	Plaintiffs reserve the right to list or use any documents produced by Defendants during discovery at the time of trial.	
236.	All deposition exhibits.	
237.	Defendants' Answers to Interrogatories, Request for Production, and Requests for Admission	
238.	Documents listed or identified by Defendants, unless otherwise objected to by Plaintiffs.	
239.	Further documents identified during discovery, if any.	
240.	Any and all documents produced by any third party, unless otherwise objected to.	
241.	Any and all documents produced pursuant to Plaintiffs' Open Records Act Request, which to date have not been produced by Defendant Stitt or the State of Oklahoma.	
242.	Documents needed for rebuttal or impeachment	
243.	Documents necessary to refresh witness's memory	
244.	Aids to Court and Jury	
245.	Demonstrative aids and enlargements	

Respectfully submitted,

/s/ Dustin J. Hopson

Dustin Hopson, OBA #19485
Amy S. Neathery, OBA #20344
Hopson Legal, LLC
119 N. Robinson Ave., Ste. 650
Oklahoma City, OK 73102
Telephone: (405) 673-7560
dustin@hopsonlawfirm.com
amy@hopsonlawfirm.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2023, I transmitted the foregoing document to the Clerk of Court using ECF System for filing and transmittal of a Notice of Electronic Filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

W. Kirk Turner
Jacob S. Crawford
McAfee & Taft
Two West Second Street, Ste. 1100
Tulsa, OK 74103
kirk.turner@mcafeetaft.com
jake.crawford@mcafeetaft.com
ATTORNEYS FOR DEFENDANTS

Ronald T. Shinn, Jr.
Michael A. Duncan
McAfee & Taft
211 North Robinson, 10th Floor
Oklahoma City, OK 73102
ron.shinn@mcafeetaft.com
alex.duncan@mcafeetaft.com
ATTORNEYS FOR DEFENDANTS

/s/ Dustin J. Hopson

Dustin J. Hopson